

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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RICHARD VARNEY, JR. individually and as
Administrator to the Estate of Lillian Varney,
Deceased

Civil Case No.: 07-695 (LDW) (AKT)

Plaintiff,

-against-

NOTICE OF MOTION

VERIZON COMMUNICATIONS, INC.,
VERIZON MANAGEMENT PENSION PLAN
and VERIZON EMPLOYEE BENEFITS
COMMITTEE,

Defendants.
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Please take notice that upon the annexed the Declaration of Richard Varney, Jr., sworn to March 20, 2012, Declaration of Peter A. Romero, sworn to on March 21, 2012, and all exhibits attached thereto, and upon all prior pleadings and proceedings herein, the undersigned shall move this Court on a date to be determined by the Court, or as soon as counsel may be heard, before the Honorable Leonard D. Wexler, at the United States Courthouse for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, New York 11722, for an Order granting Plaintiff's motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure and such other and further relief as the Court deems just and proper.

Dated: Farmingdale, New York
March 21, 2012

FRANK & ASSOCIATES, P.C.
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By: 

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